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EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.
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September 23, 1994

94-RF-09861

B. E. Williamson
Group Leader
Environmental Restoration Facilities
DOE, RFFO

QUARTERLY STATUS REPORT FOR WORK PACKAGE NO 12952 - LAG-055-94

Enclosed is the Quarterly Report for Work Package No. 12952 in fulfillment of scheduled milestones.

If there is additional information that you would like to have incorporated into the existing format for the next quarters facility report, please contact Susan Myrick at extension 6971.

D.A. Gregory - Frost

L. A. Gregory-Frost
Field Operations Manager
Environmental Restoration Program Division

SLM:bk

Orig. and 1cc - B. E. Williamson

Attachment:
As Stated

[illegible]

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N REPLY TO RFP CC NO:

ACTION ITEM STATUS

7 PARTIAL/OPEN
7 CLOSED

TR APPROVALS:

DRIG & TYPIST INITIALS

LAG: bk

A-0002-001573

ADMIN RECORD

QUARTERLY UPDATE

For August and September 1994

IDM HANDLING AND STORAGE

PREPARED BY

**ENVIRONMENTAL RESTORATION
ENVIRONMENTAL OPERATIONS MANAGEMENT**

EG&G ROCKY FLATS, INC.

September 23, 1994

INTRODUCTION

Environmental Restoration Program Division/Field Operations Management (ERPD/FOM) provides safe and proper handling and storage of filter cake (FC), a low level mixed waste from the Radiation Removal System (RRS), Soil/Sediment (SS) from the Decontamination Facilities, 903A Pad and Protected Area Pad (PA) and Decontamination Pad, and drill cuttings generated through environmental activities. These drums are stored in 90-day areas prior to transfer to the Resource Conservation and Recovery Act (RCRA) Interim Status Units 18.03 and/or 18.04.

REPORTS/CORRESPONDENCE

Investigation Derived Material (IDM) is currently being managed per Environmental Management Division (EMD) Operating Procedures 5-21000-OPS-FO, Vol. 1, Field Operations Procedures FO. 8, "Monitoring and Containerizing Drilling Fluids and Cuttings", FO.10, "Receiving and Labeling Environmental Materials Containers", and FO.23, "Management of Soil and Sediment Investigative Derived Materials". FO.8 and FO.10 are presently under revision to incorporate several policy changes. FO.8 and FO.10 comments were incorporated into the procedures. After reviewing the new draft revisions it was obvious that the contents of the procedures had changed substantially, and required an additional comment review period. Currently Woodward Clyde is reformatting FO.8 and FO.10 according to the 1-A02-PPG-003, "Procedure Writing" procedure requirements. When FO. 29, "Disposition of Soil and Sediment Investigation-Derived Materials" was issued on May 12, 1994, a Document Modification Request (DMR) was submitted for FO.23, "Management of Soil and Sediment Investigative Derived Materials" to remove all references to analysis. Training will be provided for FO.8 and FO.10 upon completion of the revisions to the procedures.

Weekly inspections on the following 90-day accumulation areas were completed on time and documented on the Waste Management 90-day Area Weekly Inspection Log Sheet.

- 1890 at the Operable Unit 2 (OU 2) Interim Measures/Interim Remedial Action (IM/IRA Facility)
- ER 2019 at the OU 4 North of 928
- ER 2164 at the T891E Storage Cabinet for Excess Chemicals

All weekly inspections for RCRA Unit 18.04 and 18.03 were completed on time and documented on the Hazardous Waste Management Container Storage Area Weekly Inspection Log Sheets.

The deficiencies documented on the log and the ERM RCRA Unit Bi-Weekly Status Reports are as follows:

- EPA code F039 is currently being stored in RCRA Units 18.03 and 10.04 and is not approved in the Part A Application
- EPA code D010 is currently being stored in RCRA Unit 18.03 and is not approved in the Part A Application

These deficiencies have been entered into the Plant Action Tracking System with the appropriate corrective actions from RCRA Regulatory Programs. The verification of the WEMS Operating Record data in support of commitments associated with the Hazardous Waste Compliance Program Plan (HWCPP) in RCRA Unit 18.04 and 18.03 will be completed on September 30, 1994.

Correspondence letters are attached to the budget work package and include necessary support requests from the following EG&G organizations: Radiological Engineering, Industrial Safety/Hygiene, Waste Operations, and 881 General Laboratories.

Sample

No spill samples were taken during this quarter. The analytical results from 183 IDM drums sampled in May were received on August 29, 1994. The Computer-Generated Classification of IDM form (FO. 29E form) from FO. 29, "Disposition of Soil and Sediment Investigation-Derived Materials" were received in September. Characterization of the IDM using these forms is in progress.

Maintenance

Outstanding Work Control Forms for RCRA Unit 18.03:

1. Painting drums for on-going drilling projects as needed.
2. Possible construct water diversion outside of tent.
3. Provide banding for IDM drums on pallets.
4. Install vents on 10 new cargos located on the southeast side of unit.
5. Double line tent fabric.
6. Cut rollers to fit cargo containers.
7. Remove excess signs from cargo containers and construct exterior fence.
8. A see through document-holder needs to be placed near the front of the gate for storage of RCRA unit information sheets.
9. Ground cargo containers.
10. Repair Cargo container doors
11. Tie Down Boards
12. Reverse U's to inside of tent and reseal all hold-downs

Completed Work Control Forms for RCRA unit 18.03:

1. Painted cargo's white and seal leaks.
2. Replaced Tent ventilators

Anticipated Activities for Next Quarter

Completion of maintenance activities is expected prior to submittal of the next quarterly report. Revisions to FO. 8 and FO. 10 will be completed. Full qualification for EOM Environmental Coordinator and Environmental Program Manager has begun and Training Requirements are anticipated to be met by November 30, 1994.

The permit modification requesting additional waste codes, capacity, and clarification of the facilities unit conditions for RCRA units 18.03 and 18.04 will be developed.

Environmental Compliance

The Colorado Department of Public Health and Environment has approved the following requested changes to the Interim Status Units 18.03 and 18.04 in accordance with 6 CCR 1007-3 Section 100.209(b) (4). The Department of Energy Rocky Flats Office had requested changes to interim status for RCRA Units 18.03 and 18.04 to support environmental restoration activities. Specifically, the changes to interim status allows outdoor storage at unit 18.03 (Unit 18.04 is not prohibited from storing containers outdoors, as a result, a request for outdoor storage at 18.04 has not been made) and 10 additional waste codes.

Current Status:

Waste, Storage, and Disposal (WS&D) has been given the responsibility of managing all 90-day accumulation areas. WS&D will assume total administrative and physical control of Unit EM-1890 at the Operable Unit 2 (OU 2) Interim Measures/Interim Remedial Action (IM/IRA Facility) and Unit ER-2019 at the OU 4 North of 928 on October 1, 1994.

Summary/Conclusions

The current number of IDM drums/containers under RCRA, Non-Hazardous and Non-RCRA Regulated management is approximately 4,268. FOM will continue to manage the IDM from the on-going ERPD drilling, sampling, soil, surface water and groundwater remediation for Integrated OUs. As Field Treatability Unit T900D proceeds with OU support to Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) remediation activities, FOM will manage their waste. Other projects currently operating which may require support include: Decontamination Pad, Well Abandonment and Replacement Program (WARP), site-wide studies, and Soil Vapor Extraction.